

**BALDASSARE
& MARA, LLC**
Attorneys at Law

VIA ECF

June 17, 2022

Honorable André M. Espinosa,
United States Magistrate Judge
U.S. District Court for the District of New Jersey
MLK Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *United States of America and State of New Jersey,*
ex rel. Rafi Khatchikian and Ivan Torres v. Port Imperial Ferry Corp., et al.,
Case No. 2:16-cv-02388 (KM) (AME)


Dear Judge Espinosa:

This firm represents Port Imperial Ferry Corporation, Port Imperial Ferry Corporation d/b/a NY Waterway, Arthur Imperatore, Romulus Development Corp., and Billybey Ferry Company, LLC ("Defendants"). Please accept this joint status letter on behalf of all parties.

The parties have met and conferred and believe that jurisdictional discovery is nearing conclusion. The parties plan to seek guidance from the Court on ministerial issues and timing related to the Court's October 7, 2021 Order (ECF 39). We anticipate that these issues can be addressed at the June 22, 2022 status conference.

We thank the Court for its time and attention in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'MB', followed by a horizontal line extending to the right.

Michael Baldassare